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THE LAW OFFICE OF JEFF CHABROWE

521 Fifth Avenue, 17th Floor New York, NY 10175 | Tel. 917.529.3921 | F 914.462.3637

DATE FILED: 12 36/24

December 20, 2024

Hon. Kimba M. Wood U.S. District Court Southern District of New York United States Courthouse 500 Pearl St. New York, NY 10007-1312

MEMO ENDORSED

Re: *United States v. Francisco Matias*, Case No. 1:09-cr-00767-KMW-2 Consent Letter Motion to Modify Bail Conditions to Extend Travel

Dear Judge Wood:

I represent Mr. Matias in the above case. I request Mr. Matias's pre-trial release conditions be modified to extend his permitted travel.

Mr. Matias was released on an appearance bond on November 25, 2024. The conditions of his pre-trial release limit his travel to the Southern District of New York. He has been living in the Dominican Republic for many years before now and was employed there. Currently, however, in New York he has to get a job. He has an opportunity to be a driver. For that, he must have access to all of the New York boroughs, New Jersey (airport access and route to Pennslvania) and the Connecticut suburbs. In addition, Mr. Matias' daughter resides in Wilkes-Barre, Pennsylvania. Her name is Ashley Matias, and she lives at 243 S. Prospect Street, Nanticoke, PA 18634.

We request his pre-trial release conditions be modified to include all five boroughs of New York, Connecticut, New Jersey and Wilkes-Barre, Pennsylvania. Pre-Trial Services consents to these modifications and the government defers their position.

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Thank you.

Respectfully Submitted,

JEFFREY CHABROWE, ESQ.

LAW OFFICES OF JEFFREY CHABROWE

521 Fifth Avenue, 17th Floor

New York, NY 10175

(917) 529-3921

Counsel for Defendant Francisco Matias

cc: Ashley Cosme, Intensive Supervision Specialist Katherine Cheng, Esq., Assistant U.S. Attorney

SO ORDERED: N.Y., N.Y. 12/24/24

KIMBA M. WOOD

U.S.D.J.